Sunset Review: Dual Enrollment Scholarship Pilot Program

24-04 FINAL REPORT | DECEMBER 2024

Aaron Cavin, **Aline Meysonnat**, Research Analysts
Ryan McCord, Audit Director; Eric Thomas, Legislative Auditor

Legislative Auditor's conclusion

Over five years, colleges provided scholarships to over 13,000 recipients. Pilot sites awarded 64% of available funds, leaving $1.3 million unspent. WSAC offers limited guidance and oversight.

Key points

- The scholarship gives financial aid to low-income students who enroll in a dual enrollment program like Running Start.

- By helping students pay for books, materials, and fees, the scholarship reduced financial barriers as intended. The median award was $60 (2023-24 school year).

- It is unclear whether the scholarship increased enrollment of low-income Running Start students.

- Washington Student Achievement Council does not provide sufficient program oversight or guidance for pilot sites. As a result, student eligibility decisions and covered costs vary.

- The scholarship is a pilot program that ends in 2025 unless the Legislature renews it.

Executive summary

In 2019, the Legislature created the Dual Enrollment Scholarship pilot program (RCW 28B.76.730). The scholarship is subject to the Sunset Act and ends in 2025 unless reauthorized by the Legislature (**Appendix C**).

Dual Enrollment...

The scholarship gives financial aid to low-income students who enroll in a dual enrollment program like Running Start

Dual enrollment programs allow high school students to earn college and high school credit at the same time. Running Start is one dual enrollment program offered in Washington.

- To qualify for the scholarship, students must be eligible for free- or reduced-price lunch, have at least a 2.0 grade point average, and enroll in Running Start at a pilot site.

- Thirteen community and technical colleges and universities currently serve as pilot sites. The number has changed during the five-year pilot.

- From 2019-20 through 2022-23, students enrolled in College in the High School (CiHS) were eligible for the scholarship. The 2023 Legislature eliminated student fees and this scholarship for CiHS in 2023. As a result, this report focuses on Running Start.

The Washington Student Achievement Council (WSAC) operates the scholarship pilot program.

By helping students pay for books, materials, and fees, the scholarship reduced financial barriers as intended

Pilot sites award scholarships each quarter. Students use the scholarship to pay for mandatory fees, course fees or laboratory fees, textbooks, or apprenticeship tools and supplies.

In the 2023-24 school year,

- The median scholarship amount was $60.

- 75% of scholarships were less than $140.

- The amount per student ranged from $1.36 to $2,005. The latter paid for tools needed for an automotive class.

The amount of the scholarship depends on several factors. Pilot sites differ in how much money is available and how they award it to students. Course fees range from less than $10 to over $400. A student's decision about their courses also can affect the award; Some courses have few to no costs, while others have high textbook or materials costs.

Students may still have costs that, by law, the scholarship cannot pay for. These include higher-priced textbooks, transportation, technology, and required pre-college courses.

Figure 1: In the 2023-24 school year, 75% of scholarships were under $140

Under $140: 75% $140-$350: 24%

$350 or more: 1%

Source: JLARC staff analysis of pilot site invoices.

Pilot sites awarded 64% of available funds, leaving $1.3 million unspent

Pilot sites have not awarded the full amount available for scholarships. Over the last five years, they spent $2.4 million of the $3.7 million available (64%). From fiscal year 2020 through 2023, this included scholarships for the College in the High School program. In the 2023-24 school year, textbooks, course and laboratory fees, and mandatory fees account for 96% of costs covered.

Figure 2: Pilot sites awarded 64% of available funds

SCHOLARSHIPS AWARDED	NOT SPENT
$2.4 million (64%)	$1.3 million (36%)

Source: JLARC staff analysis of WSAC data.

It is unclear whether the scholarship has increased enrollment of low-income Running Start students

The Legislature aimed to increase low-income students' access to postsecondary education (e.g., community college, trade school, four-year university). It is unclear whether the scholarship achieved that goal.

JLARC staff evaluated WSAC's enrollment and student achievement data to evaluate access.

- Enrollment increased for both students who were eligible for the scholarship and students who received the scholarship.

- Students often enroll in Running Start before they know about the scholarship or award amount.

- As such, it is unclear whether the scholarship has influenced a student's decision to enroll. It may affect their decisions about taking courses in the later quarters.

Washington Student Achievement Council does not provide sufficient program oversight or guidance for pilot sites

By law, WSAC can set rules for the scholarship. WSAC has not adopted rules or offered adequate guidance to ensure pilot sites manage the scholarship consistently. For example:

- Without guidance, pilot sites interpreted the requirements for GPA, income eligibility, and allowed costs differently.

- Pilot sites award scholarships and invoice WSAC for expenses. Invoices do not contain details needed for WSAC to verify that expenses meet the criteria in law. JLARC staff identified at least $7,500 of ineligible textbook expenses for the 2023-24 school year.

Best practice suggests that WSAC should offer formal guidance and technical assistance (e.g. training, information sessions) to improve fund distribution and ease the administrative burden for pilot sites.

Sunset review questions

Figure 3: Pilot program reduces financial barriers, but WSAC needs to improve oversight and ensure colleges award all funds

Question	Analysis
To what extent has the pilot program complied with legislative intent?	🟢 Has reduced financial barriers. 🟠 36% of funds were unspent. 🟠 Unclear if scholarship increased access and enrollment.
Has WSAC administered the program in an efficient and economical manner, with adequate cost controls in place?	🟢 WSAC spends an average of $33,000 per year to administer the program. 🟠 WSAC's oversight is insufficient to ensure consistency and compliance with law.
To what extent does the program duplicate the activities of other entities or the private sector?	🟢 Does not replace or directly duplicate other scholarships. WSAC requires a college to apply its other scholarship funds before these funds.
To what extent is WSAC meeting its performance measures for the program?	🟢 Scholarship provides financial support to eligible students. 🟠 Effect on enrollment for low-income Running Start students is unclear.
What are the possible effects of terminating or changing the program?	**Termination:** Eligible low-income students would need to pay for expenses now covered by the scholarship. **Change:** Spending all available funds by changing eligible expenses, increasing availability, or taking other actions could better meet legislative goals.

Source: JLARC staff analysis.

Legislative Auditor's recommendations

1. The Legislature should continue the Dual Enrollment Scholarship.

2. WSAC should provide consistent and documented guidance and technical assistance to pilot sites and improve its oversight.

WSAC concurs with recommendation #1 and partially concurs with recommendation #2. You can find additional information in the **Recommendations section**.

Committee action to distribute report

On December 4, 2024 this report was approved for distribution by the Joint Legislative Audit and Review Committee. Action to distribute this report does not imply the Committee agrees or disagrees with Legislative Auditor recommendations.

Part 1.
Scholarship

Dual enrollment programs allow high school students to earn college and high school credit at the same time. Running Start is one dual enrollment program offered in Washington. Running Start students attend in-person and online classes offered by community colleges and some universities without paying tuition. However, they may have other costs such as textbooks and fees for class materials.

In 2019, the Legislature created the Dual Enrollment Scholarship pilot program. The scholarship program:

- Aims to reduce financial barriers for low-income students and increase their access to postsecondary education (RCW **28B.76.730**).

- Helps students pay for textbooks, class materials, and other costs.

- Ends in 2025 unless the Legislature reauthorizes it.

College in the High School
From 2019-20 through 2022-23, students in Running Start and College in the High School (CiHS) were eligible for the scholarship.

The 2023 Legislature eliminated student fees and this scholarship for CiHS.

As a result, this report focuses on Running Start.

The Washington Student Achievement Council (WSAC) operates the scholarship program.

1. The Legislature appropriates funds to WSAC.

2. Colleges and universities serving as pilot sites request funds based on anticipated student needs.

3. The pilot sites award funds to eligible students.

4. Pilot sites invoice WSAC for scholarship awards, and WSAC reimburses colleges.

Part 4 details WSAC's program oversight.

The Legislature appropriated $850,000 for the first fiscal year of the program. After that, it appropriated $750,000 per fiscal year. **Part 2** has details about how the pilot sites used the funds.

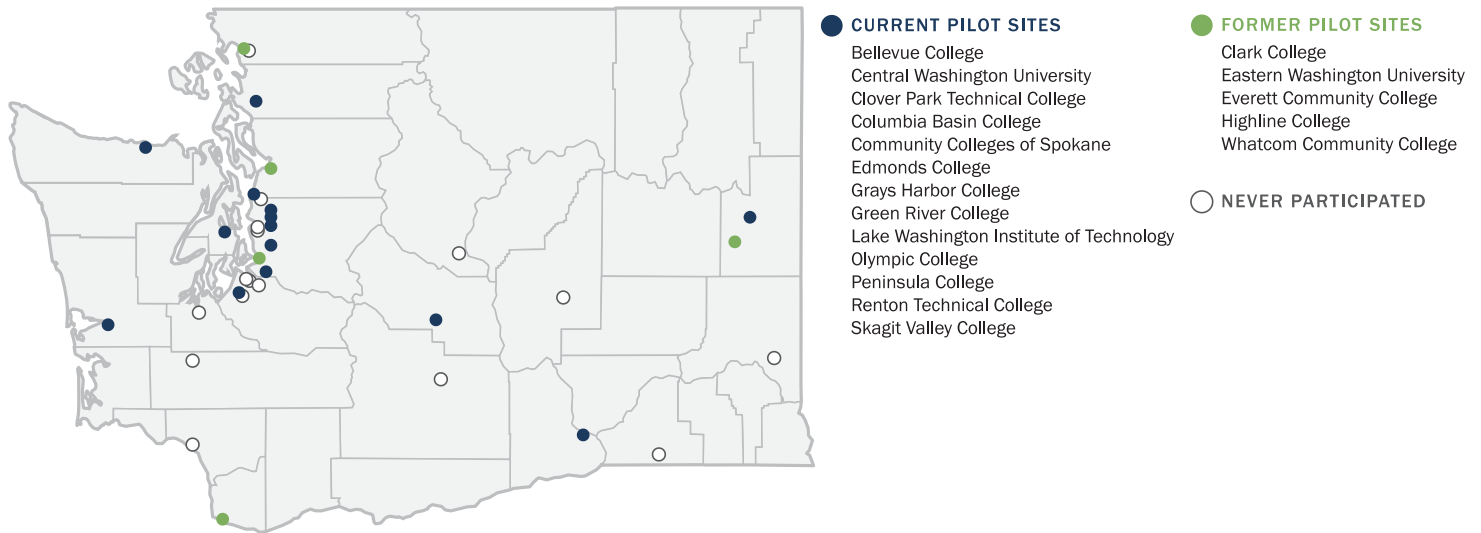## 13 pilot sites currently offer the scholarship

All 34 community and technical colleges, three universities (CWU, EWU, and WSU), and one public tribal college offer Running Start.

In the program's first year, WSAC selected three pilot sites: Clark College, Eastern Washington University, and Whatcom Community College. After that, other schools with Running Start programs could apply to serve as pilot sites and receive scholarship funds. WSAC reports that funds have been sufficient to provide grants to all interested schools.

The list of participating pilot sites has changed as some schools stopped participating and others started.

- In total, 19 schools have participated; two Spokane colleges operate as one pilot site. Currently, 13 pilot sites offer the scholarship.

- JLARC staff surveyed the colleges that did not participate. Of the 17 respondents, 10 reported that they had not heard about the scholarship.

- More information about school participation is in **Part 4**.

Figure 4: Thirteen pilot sites offered the scholarships in the 2023-24 school year

CURRENT PILOT SITES
Bellevue College
Central Washington University
Clover Park Technical College
Columbia Basin College
Community Colleges of Spokane
Edmonds College
Grays Harbor College
Green River College
Lake Washington Institute of Technology
Olympic College
Peninsula College
Renton Technical College
Skagit Valley College

FORMER PILOT SITES
Clark College
Eastern Washington University
Everett Community College
Highline College
Whatcom Community College

○ NEVER PARTICIPATED

College participation over time   −

	2019-20	2020-21	2021-22	2022-23	2023-24
Clark College	X	X	X	X	
Eastern Washington University	X	X	X	X	
Whatcom Community College	X	X	X		
Everett Community College		X	X	X	

	2019-20	2020-21	2021-22	2022-23	2023-24
Highline College		X	X	X	
Central Washington University		X	X	X	X
Green River College		X	X	X	X
Skagit Valley College		X	X	X	X
Community Colleges of Spokane (2 schools)		X	X	X	X
Bellevue College					X
Clover Park Technical College					X
Columbia Basin College					X
Edmonds College					X
Grays Harbor College					X
Lake Washington Institute of Technology					X
Olympic College					X
Peninsula College					X
Renton Technical College					X
Bates Technical College					
Bellingham Technical College					
Big Bend Community College					
Cascadia College					
Centralia College					
Lower Columbia College					
North Seattle College					
Northwest Indian College					
Pierce College (2 schools)					
Seattle Central College					
Shoreline Community College					
South Puget Sound Community College					
South Seattle College					

Number of scholarship recipients has grown

All high school juniors and seniors can enroll in Running Start. A student must meet three criteria to be eligible for the scholarship:

1. Be eligible for free- or reduced-price lunch based on their household income.

2. Have at least a 2.0 grade point average (GPA).

3. Be enrolled in Running Start at a pilot site.

In school year 2019-2020, the three pilot sites reported 683 scholarship recipients to WSAC. In the 2023-24 school year, thirteen pilot sites reported 3,798. Over the last five school years, the pilot sites reported a total of 13,256 Running Start scholarship recipients.

- Seventeen of the 18 pilot sites allowed students to receive the scholarship more than once (e.g., in the fall and spring quarters). One college that did not allow multiple scholarships participated only in the 2023-24 school year.

- Pilot sites counted students each time they received the scholarship. As a result, the number of individual students is unknown but likely lower than the number of scholarship recipients.

Figure 5: Number of scholarship recipients at pilot sites increased

	recipients	pilot sites
2019-20	683	3
2020-21	1,834	9
2021-22	2,975	9
2022-23	3,966	9
2023-24	3,798	13

Note: Figures are not unduplicated. Students who enrolled in Running Start or received the scholarship in more than one quarter are counted for each instance.
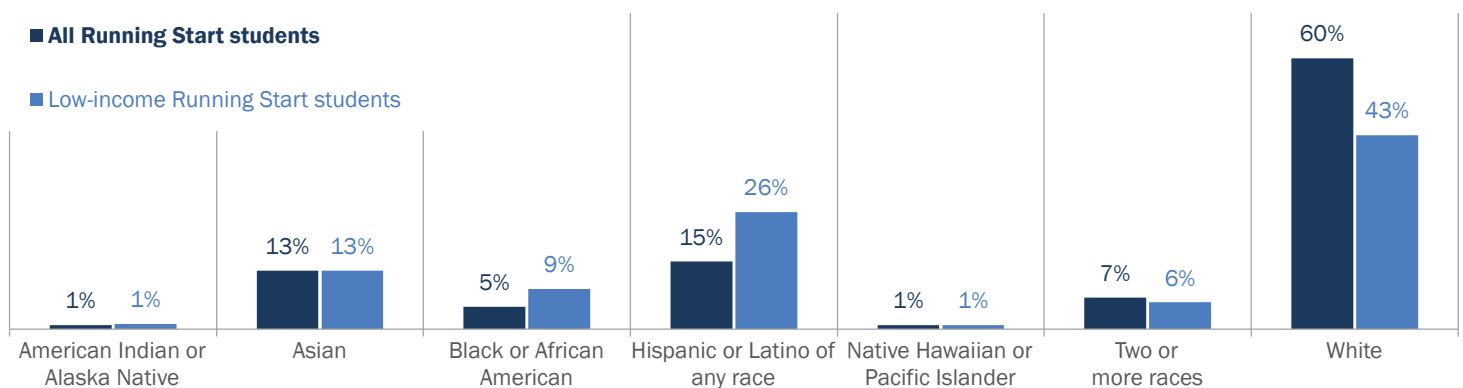
Source: JLARC analysis of WSAC data.

WSAC has limited data about race and ethnicity of scholarship recipients

Pilot sites reported data to WSAC about scholarship recipients' race and ethnicity beginning in school year 2021-22.

- WSAC provided data for the 2021-22 and 2022-23 school years. As of August 2024, comparable 2023-24 data was not yet available.

- The data for these two school years is incomplete because eight of the nine participating pilot sites did not report data for all quarters. **Part 3** discusses data problems in more detail.

- In the available data, 35% of scholarship recipients did not state their race or ethnicity.

  - Another 1% reported being American Indian/Alaskan Native, 11% Asian, 5% Black/African American, 9% Hispanic or Latino, 1% Native Hawaiian/Other Pacific Islander, 6% two or more races and 32% white.

The Education Research and Data Center (ERDC) collects data about the race and ethnicity of Running Start students (Figure 6). However, due to the lack of data, it is impossible to compare the reported race and ethnicity of scholarship recipients with information about Running Start students overall.

Figure 6: The ERDC collects data about the race and ethnicity of Running Start students

Source: JLARC analysis of WSAC data.

According to WSAC, racial disparities exist in Running Start participation. Asian and White students are more likely than students of other races to enroll in Running Start courses. Data from WSAC and ERDC also does not include more specific race and ethnicity data, which the Office of the Superintendent of Public Instruction recently started collecting for students. For example, it includes categories for Asian and Native Hawaiian or Other Pacific Islander populations but not more specific categories such as Japanese or Filipino.

Part 2.
Financial barriers

When it created the scholarship, the Legislature stated its intent was to reduce financial barriers for low-income Running Start students.

Scholarship helps pay for fees, textbooks, and materials

The law does not define financial barriers. Instead, it lists the expenses that the scholarship may pay for:

- **Textbook costs of $10/credit up to 15 credits**. For a fully enrolled student, this would be a maximum of $150 per quarter.

- **Mandatory fees**. This includes fees that remain after the college applies the waiver for low-income Running Start students under RCW 28B.76.330(7). For example, the scholarship could pay for technology or student service fees that the college did not waive.

- **Course or laboratory fees**. This includes laboratory supplies, digital materials, or other materials needed for a course.

- **Apprenticeship materials**. This includes occupational tools, supplies, work gear, clothes, or boots for professional or technical programs (e.g., welding, automotive, culinary arts, health care, and aerospace programs).

In general, pilot sites manage the scholarship by identifying eligible students, applying the scholarship to applicable fees, and then adding funds to the student's account at the campus bookstore. Students can use funds to buy required textbooks and materials. It is unclear whether students receive enough scholarship funding to cover all their eligible costs.

In 2023-24, recipients used 43% of scholarship funds for textbooks. Prior year data is incomplete for comparison.

Figure 7: In the 2023-24 school year, recipients used 43% of scholarship funds for textbooks

Category	Amount spent	Percent of total
Textbooks	$158,545	43%
Mandatory feeds	$104,314	28%
Course & laboratory fees	$88,058	24%
Apprenticeship materials	$12,333	3%
Other/unknown	$3,780	1%
Total	**$367,030**	**100%**

Note: Sum of percents does not equal 100% due to rounding. Unknown includes expenditures that invoices did not contain sufficient information to categorize.

Source: JLARC staff analysis of pilot site invoices for 2023-24 as of August 15, 2024.

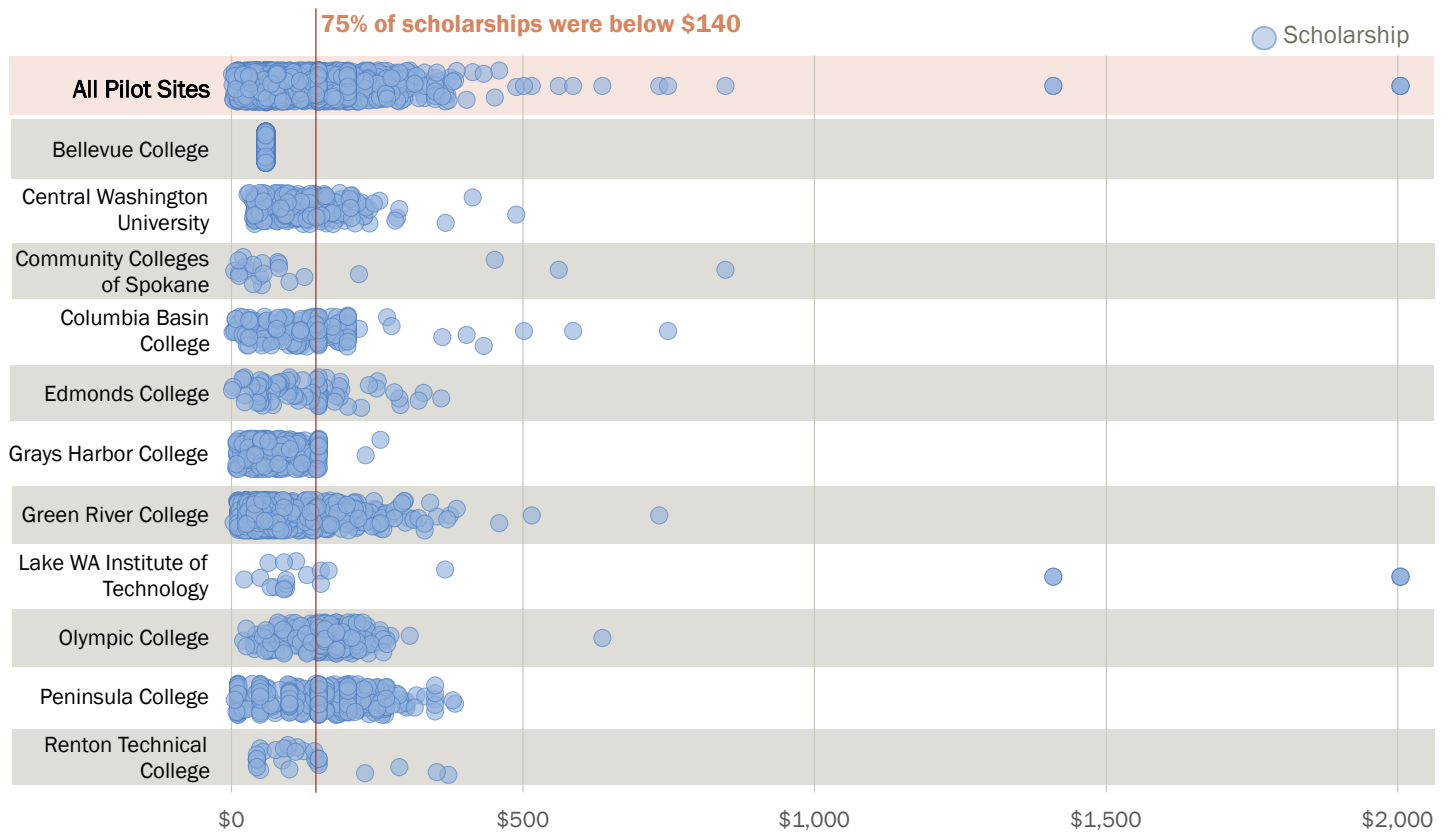## The amount of the scholarship varies by student and college

Students receive different scholarship amounts. In the 2023-24 school year, the median scholarship was $60, and 75% of scholarships were below $140. Still, outliers exist. For example, three scholarships were $2,005 due to the cost of tools needed for an automotive class.

The amount of the scholarship depends upon several factors.

- **College funding**. Colleges decide how much money to request from WSAC. WSAC does not cap the amount a college may request. In fiscal year 2024, grants to the colleges ranged from $10,000 to $100,000.

- **Distribution method.** Seventeen colleges award scholarships as students incur eligible expenses. As a result, some students will receive more than others. One school -- Bellevue College -- gives the same amount to each eligible student.

- **College fee structure**. Colleges set course and laboratory fees. In 2023-24, course fees at pilot sites ranged from $1 for a humanities course to $450 for a culinary arts course. At least ten colleges waive these fees for all low-income Running Start students.

- **Course material format**. Faculty may assign physical textbooks or digital course materials. Statute limits qualifying textbook expenditures to $10 per credit but there is no limit for digital course materials.

- **Course selection**. Students decide how many credits and which courses to take. Some courses have few to no costs, while others, such as professional and technical courses, have high textbook or materials costs.

Figure 8: School year 2023-24 scholarship amounts vary by student and by college

75% of scholarships were below $140

Scholarship

		$0	$500	$1,000	$1,500	$2,000
All Pilot Sites						
Bellevue College						
Central Washington University						
Community Colleges of Spokane						
Columbia Basin College						
Edmonds College						
Grays Harbor College						
Green River College						
Lake WA Institute of Technology						
Olympic College						
Peninsula College						
Renton Technical College						

Additional detail about awards by college −

	Count	Minimum	Maximum	Average	Median
All	3,798	$1	$2,005	$97	$60
Bellevue College	1,175	$59	$60	$60	$59
Central Washington University	224	$28	$489	$120	$109
Columbia Basin College	22	$5	$848	$134	$52
Community Colleges of Spokane	182	$3	$749	$127	$113
Edmonds College	77	$1	$360	$125	$112
Grays Harbor College	374	$9	$256	$74	$68
Green River College	892	$4	$734	$81	$56
Lake Washington Institute of Technology	22	$22	$2,005	$489	$94
Olympic College	325	$20	$636	$169	$180
Peninsula College	476	$6	$384	$137	$150
Renton Technical College	29	$43	$373	$124	$100

Note: Invoice data was not available from Clover Park Technical College or Skagit Valley College as of August 15, 2024.

Source: JLARC staff analysis of pilot site invoices for 2023-24.

WSAC and colleges have not awarded all available scholarship funds

Pilot sites have not awarded the full amount available for scholarships. Over the last five years, they spent $2.4 million of the $3.7 million available (64%) for Running Start and College in the High School scholarships. Unspent funds are returned to the General Fund.

Not all eligible students at pilot sites receive scholarships. Distributing all the available funding would better meet the Legislature's intent of reducing financial barriers for low-income Running Start students.

In interviews, some Running Start coordinators at pilot sites stated that the scholarship's eligibility requirements are too restrictive. For example, five coordinators mentioned that the 2.0 GPA requirement could limit participation. Also, requiring that students be eligible for free or reduced-price lunch excludes students whose income is above that limit but may still face challenges affording course fees, textbooks, or materials.

Figure 9: Pilot sites have awarded between 45% and 87% of the funding available for scholarships

Fiscal year	School year	Available for scholarships	Scholarships awarded	Percent awarded as scholarships
2020	2019-2020	$758,000	$343,074	45%
2021	2020-2021	$729,547	$636,968	87%
2022	2021-2022	$750,000	$411,303	55%
2023	2022-2023	$750,000	$639,446	85%
2024	2023-2024	$750,000	$367,048	49%
Total		**$3,737,547**	**$2,397,840**	**64%**

Note: Available amounts in fiscal years 2020 and 2021 reflect deduction for WSAC administration. Scholarships included the College in the High School program until the 2023-24 school year.

Source: JLARC staff analysis of WSAC data and pilot site invoices as of August 15, 2015.

Students may still have costs that, by law, the scholarship cannot pay for

By law, the scholarship cannot pay for:

- **Textbook costs more than $10 per credit**. Pilot sites reported that books typically cost more than $10 per credit. Further, although Running Start students may enroll in up to 21 credits per quarter, statute caps the textbook reimbursement at 15 credits.

- **Transportation**. Students who attend classes in person may incur costs such as automobile payments, gas, parking fees, or public transit costs. According to Washington Financial Aid Association (WFAA), transportation costs $1,800 per year.

- **Food**. Students who are eligible for the scholarship are eligible for free or reduced-price lunch at their high schools. They may be unable to access these meals when they attend Running Start courses.

- **Technology or internet access**. Students may need computers, laptops, other technology, or internet access to participate in courses.

- **Pre-college courses and support courses**. Colleges may require Running Start students to take pre-college or support courses. For example, a student may need to take an introductory math class to ensure they have the skills needed for advanced math courses. Students may need to pay tuition for these pre-college and support courses.

Nearly all Running Start coordinators at pilot sites told JLARC staff that these costs pose additional financial barriers for students. On average, colleges that offer Running Start estimate that books and supplies cost $255 per quarter for a student taking the typical Running Start course load of 12 credits. As noted above, the median scholarship is $60.

Running Start students are not eligible to receive federal financial aid to cover program costs.

In addition to the scholarship, colleges help low-income Running Start students with additional costs

JLARC staff interviewed or surveyed staff at 36 colleges, including pilot sites and those that did not participate in the program. The college staff reported that, for all low-income Running Start students:
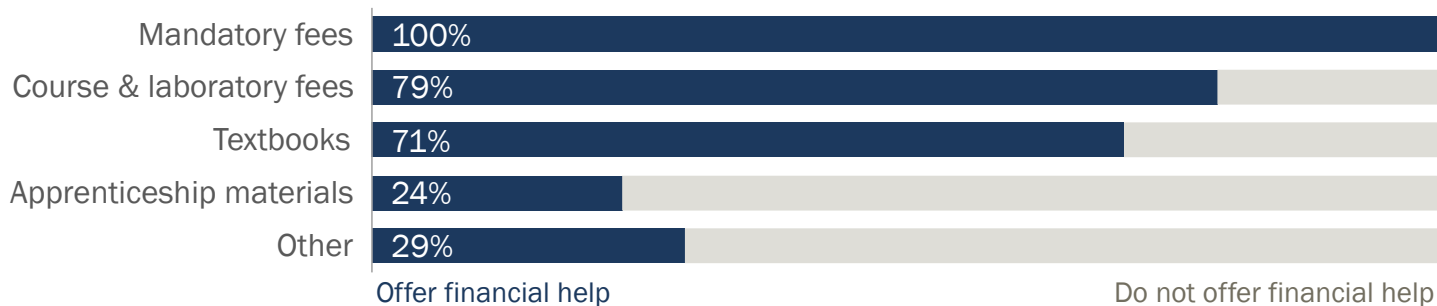
- As required by law, all colleges offer waivers for mandatory fees.

- 81% help with textbook costs.

- 72% help with course and laboratory fees.

- Fewer help with apprenticeship materials (25%) or other costs such as transportation (31%).

This financial aid generally does not cover all Running Start costs. For example, one college provides a 50% discount on textbooks for low-income Running Start students.

Colleges cannot replace other aid they offer to students with the Dual Enrollment Scholarship. The scholarship can only be available in addition to other aid. As such, the scholarship does not directly duplicate other programs that provide financial assistance to low-income Running Start students.

Figure 10: Most colleges help low-income Running Start students with costs

Mandatory fees	100%	
Course & laboratory fees	79%	
Textbooks	71%	
Apprenticeship materials	24%	
Other	29%	

Offer financial help   Do not offer financial help

Note: Other costs include funds that students can use for various needs such as transportation or books.

Source: JLARC staff analysis based on survey responses, interviews, and information provided by 36 colleges.

Part 3.
Access

The Legislature aimed to increase access to postsecondary educational opportunities for low-income students by removing financial barriers.

Pilot sites were responsible for collecting data and reporting it to WSAC. This data is incomplete and does not show whether the scholarship improves access. JLARC staff evaluated enrollment and student achievement as alternatives to evaluate access. It is unclear whether the scholarship affected students' decisions to participate in Running Start, their course taking behavior, or college path.

Data is insufficient to determine scholarship's effect on access

Statute does not define access. As required by law, WSAC set 18 performance measures and developed a data collection plan for this sunset review (**Appendix B**). Some of the measures are related to access. However, pilot sites did not report the data for these measures consistently. As a result, it is insufficient to evaluate the scholarship's effect on access. Some of the key data problems include:

- **Data cannot show effect on individual students.** Pilot sites collected data at the aggregate level. As a result, the data does not show how many times a student received a scholarship. The research design cannot show whether the scholarship affected students' decisions or whether they benefited from participation.

- **Data counts students more than once:** As written, some WSAC performance measures reflect nonduplicated student counts per quarter. However, the student counts in the data are likely duplicative for several performance measures such as the number of courses taken, credits attempted, and credits earned.

- **Data is incomplete:** WSAC began collecting data in 2020. Only one pilot site reported data for all years and quarters that it participated. Also, data was not consistently available for some measures, including those related to students' ability to earn credit toward an associate degree.

WSAC states that it provided pilot sites with data templates and contacted them multiple times to collect data. Pilot sites reported difficulties providing data due to staff turnover and data availability. WSAC also noted that when it distributed the funds to pilot sites up front, they had less incentive to comply with reporting requirements. WSAC hopes its invoice system will improve reporting.

Enrollment can indicate access, and enrollment in Running Start has increased

WSAC aims to increase low-income students' participation in Running Start, and enrollment is a commonly accepted indicator of educational equity.

In the three years from 2020-21 to 2022-23, nine pilot sites awarded scholarships. At the same time, the number of students enrolled at these nine sites grew:

- The growth for all Running Start enrollment was 61%.

- The number of students eligible for the scholarship grew 84%; eligible means qualifying as low-income and having at least a 2.0 GPA.

- The number of scholarship recipients grew 116%.

- It is unknown whether the scholarship influenced enrollment.

Figure 11: The number of scholarship eligible students and recipients grew faster than Running Start enrollment at nine pilot sites
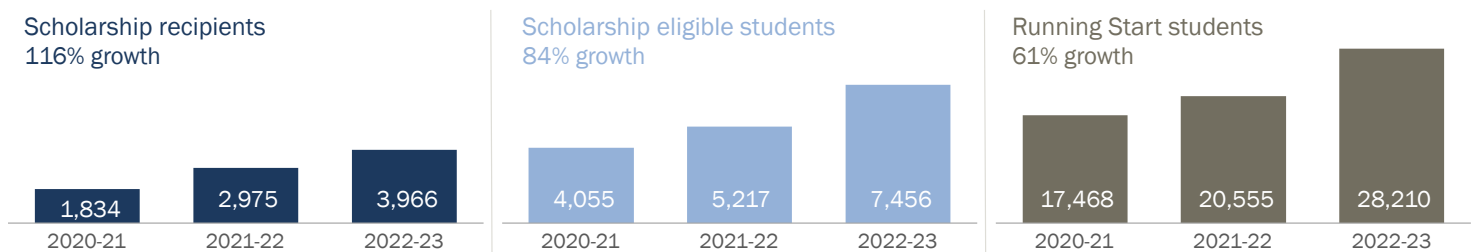
Note: Figures are not unduplicated; pilot sites counted students in each quarter they enrolled. The nine sites are Clark College, Eastern Washington University, Whatcom Community College, Everett Community College, Highline College, Central Washington University, Green River College, Skagit Valley College, and Community Colleges of Spokane.

Source: JLARC staff analysis of WSAC data.

Students may not learn about the scholarship before they decide to enroll

For the scholarship to increase access, students would need to know two things before they enroll in Running Start: that the scholarship exists and what costs it will cover.
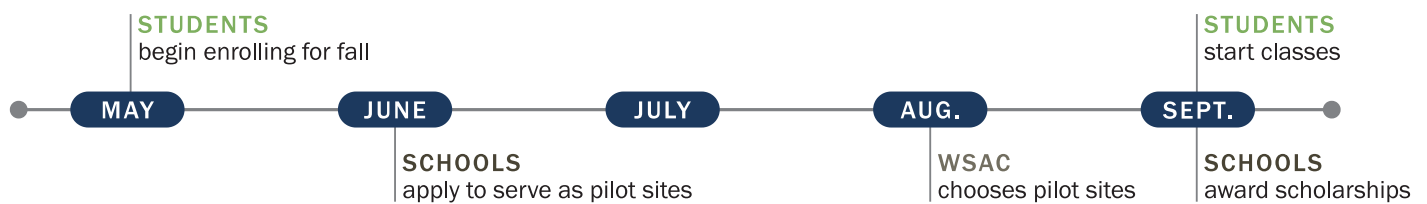
It is unclear if students know about the scholarship before enrolling. In interviews, pilot sites that visit high schools to talk about their Running Start courses report different approaches. Some tell students about the scholarship during these sessions. Others do not because they are unsure what funds will be available. Students who do not attend also may not receive the information.

WSAC set a timeline for scholarship awards. The timeline makes it unlikely that students who enroll for fall classes will know how much they will receive before registration.

- Students can enroll in May for fall classes.

- WSAC tells pilot sites in August how much money they can award for that school year.

- Students typically enroll in classes before they receive the scholarship.

Figure 12: Students may enroll in Running Start before colleges know if the scholarship is available

STUDENTS
begin enrolling for fall

STUDENTS
start classes

| MAY | JUNE | JULY | AUG. | SEPT. |

SCHOOLS
apply to serve as pilot sites

WSAC
chooses pilot sites

SCHOOLS
award scholarships

Source: JLAC staff analysis of college calendars, WSAC data, and interviews with Running Start staff.

Recent legislation may improve awareness of the scholarship

The 2024 Legislature passed House Bill 1146 (Chapter 44, Laws of 2024). Public schools must now tell students and their parents or guardians about dual credit programs and available financial aid. WSAC is working with the Office of Superintendent of Public Instruction, the State Board of Community and Technical Colleges, and the Council of Presidents to develop guidance for school districts.

Scholarship recipients achieved results that are like those of all Running Start students

WSAC data shows that scholarship recipients took about three classes per quarter and earned 12 credits. They passed 86% of classes. Their results are nearly the same as all scholarship eligible and Running Start students.

This is consistent with an SBCTC report that found Running Start students pass courses and complete credits at relatively high rates.

Figure 13: Scholarship recipients and students eligible for the scholarship achieved results that are comparable to all Running Start students

	Scholarship recipients	Scholarship eligible	All Running Start
Courses per quarter	2.9	2.9	2.8
Credits earned per quarter	12	11	11
Passing rate	86%	86%	89%

JLARC staff excluded some data from the analysis due to reporting errors. Calculations are averages for all years and quarters at all pilot sites, except for passing rate, which includes only 2021-23.

Source: JLARC staff analysis of WSAC data.

The scholarship may have helped students pass or take more classes

Research indicates that low-income college students who receive financial aid are more likely to earn more college credits, complete courses, and obtain a degree, compared to those who do not receive financial aid. According to WSAC's analysis of graduation and matriculation data, students who take part in dual credit programs are more likely to graduate from high school and finish additional education.

Running Start coordinators and relevant research report that financial aid and scholarships may help students:

- Pass courses by allowing them to purchase books or materials they could not afford otherwise.

- Take classes that they might not have taken due to fees or materials costs.

- Complete their programs.

- Go to a 4-year college or university.

Part 4.
Oversight

WSAC manages the scholarship program. It selects pilot sites, completes grant agreements, distributes funds, and collects reports from pilot sites about expenditures and scholarship recipients. The agency spends about $33,000 per year, on average, to administer the scholarship program. This equates to about a quarter of a full-time staff person's time.

From fiscal year 2020 through 2023, this included scholarships for the College in the High School program. In the first two years, WSAC used the scholarship appropriation to pay for its management. Since fiscal year 2022, it has used other agency funds.

WSAC's billing procedures do not ensure that all scholarship expenses meet statutory requirements

WSAC currently uses a reimbursement-based grant approach: pilot sites award scholarships within an agreed-upon limit and invoice WSAC for expenses.

WSAC did not ask pilot sites to include key information on invoices. For example, they do not state total expenditures per student, each expenditure's category (e.g., textbooks, materials), and the number of credits each student is enrolled in.

Invoices from the 2023-24 school year indicate that pilot sites used funds for ineligible expenses, and that WSAC approved payment.

- JLARC staff identified at least $7,500 of ineligible textbook expenses for the 2023-24 school year. However, we cannot quantify exact amounts of ineligible expenditures because the allowable amount depends on how many credits a student takes. Invoices do not include that information.

- WSAC also paid $104,000 for mandatory fees in the 2023-24 school year. It is unclear if these fees are eligible expenses. As noted above, colleges must waive mandatory fees for low-income Running Start students, unless the fees are for materials that the student keeps or uses up during a course.

Without WSAC rulemaking and guidance, pilot sites determine eligibility and allowable expenditures differently

Statute grants WSAC rulemaking authority for the scholarship. However, WSAC did not adopt formal rules or develop adequate guidance to help colleges administer the scholarship.

In the absence of rulemaking, pilot sites have different ways of determining eligibility and covered expenditures.

- Pilot sites reported using two ways to calculate GPA: using student's cumulative high school GPA or the student's GPA on college courses only. The latter effectively waives the GPA requirement for new Running Start students.

- Most pilot sites determine the student's eligibility for free or reduced-price lunch based on the student's household income. One based it on the relevant school district's overall percent of eligible students.

- The scholarship can pay for apprenticeship materials and digital educational materials. At least two pilot sites told JLARC staff that they did not know these were eligible expenses.

Pilot sites also distribute funds differently. At 12 pilot sites, eligible students do not need to apply to receive the scholarship. The colleges remove fees and apply textbook vouchers to their accounts automatically. One pilot site requires students to apply for scholarship funds.

Colleges report challenges administering the scholarship

Pilot sites must set procedures to identify eligible students, communicate with them, and then determine and pay for allowable expenditures. In interviews with JLARC staff, they reported that these steps can take time and resources. For example, eligibility decisions require information from high school counselors. Payment decisions require coordination with faculty, billing office, bookstores, and others.

Existing college billing and administrative systems may not be set up to complete these tasks. This requires staff to complete them manually on a student-by-student basis.

Colleges cite administrative burden and lack of awareness as reasons for not participating as a pilot site

As noted in **Part 1**, 19 colleges have served as pilot sites. Five stopped and 19 have never participated. Some of the reasons that they did not participate or stopped include:

- **Reporting burdens**. Running Start coordinators stated that reporting requirements were too burdensome. Pilot sites must report on 18 performance measures and submit invoices. Other entities, like the State Board for Community and Technical Colleges and ERDC, do not collect the data specific to the scholarship.

- **Lack of staff capacity**. Running Start coordinators report that, in addition to managing this scholarship, their responsibilities include program administration and student advising. This can limit their ability to apply for and manage the scholarship.

- **Lack of information.** JLARC staff surveyed the 19 colleges that did not participate. Of the 17 respondents, 10 reported that they had not heard about the scholarship.

- **More efficient alternatives.** Two pilot sites told WSAC that they left the program because it was more efficient to use their own institutional funds to assist low-income Running Start students with course fees, lab fees, or textbooks.

According to a recent U.S. Government Accountability Office (GAO) report, technical assistance can mitigate administrative burdens for grantees. Technical assistance includes training, consultation, guidance, and advice to help grantees implement the program and improve performance.

Part 5.
Sunset questions

By law, sunset reviews must answer five questions (Chapter 43.131 RCW).

To what extent has the Dual Enrollment Scholarship pilot program complied with legislative intent to reduce barriers and increase access to postsecondary education

for low-income students?

The dual enrollment scholarship has reduced financial barriers for low-income Running Start students. From fiscal year 2020 through 2024, the scholarship provided $1.4 million for 13,256 Running Start scholarship recipients. The total including College in the High School was $2.4 million. Scholarships paid for textbooks, course fees and lab fees, mandatory fees, and apprenticeship materials.

It is unclear how much the scholarship has increased access to postsecondary education. Data is not sufficient to evaluate the scholarship's effect on enrollment. Students begin enrolling in Running Start in May. WSAC tells pilot sites in August how much money they can award for that school year. The timeline makes it unlikely that students will know how much they will receive before registration.

Has WSAC administered the program in an efficient and economical manner, with adequate cost controls in place?

WSAC spends an average of $33,000 per year to administer the scholarship program. This includes administration of scholarships for College in the High School from fiscal year 2020 through 2023.

In the first two years of the program, funding came from the scholarship appropriation. After that, it came from other agency funds. Overall, WSAC has spent $164,550 on program administration, which is the equivalent of 4.3% of the $3.85 million appropriation. This is consistent with the 5% allowed for administration by a federal grant awarded to colleges during the pandemic.

Cost controls have been inadequate to ensure compliance with statutory requirements. WSAC's transition to an invoice system has improved accountability of funds, compared to distributing grant awards up front. However, invoices do not contain enough information to verify compliance with statutory requirements. JLARC staff's review of invoices indicates that WSAC has reimbursed pilot sites for ineligible expenditures.

To what extent does the program duplicate the activities of other entities or the private sector?

The scholarship does not replace or directly duplicate the activities of other entities or the private sector. While all colleges provide some forms of assistance to low-income Running Start students, WSAC requires that they use the dual enrollment scholarship in addition to any other assistance.

To what extent is WSAC meeting its performance measures for the program?

WSAC set 18 performance measures but was unable to collect sufficient data for all of them. WSAC states that the goals of the scholarship program are to:

- Offer additional financial supports and remove barriers to low-income students currently enrolled in Running Start.
- Increase the number of low-income students participating in Running Start.

Available data indicates that:

- The scholarship provides additional financial supports and removes financial barriers for low-income students enrolled in Running Start.

- Scholarship recipients take courses and complete credits at rates that are like all Running Start students. This is consistent with other research on the performance of low-income Running Start students.

Available data is not sufficient to determine the extent to which the dual enrollment scholarship has increased low-income students' enrollment and participation in Running Start.

What are the possible effects of terminating or changing the program?

If the dual enrollment scholarship ended, low-income Running Start students might need to pay for expenses currently covered by the scholarship. Colleges could elect to pay for these expenses with their own funds. Based on ERDC data, 6,200 Running Start students statewide qualified as low-income in 2022.

If the dual enrollment scholarship were made available at all institutions of higher education that offer Running Start, participation in the program may increase. Further, changing the eligibility criteria and adding more allowable expenditures could maximize use of the scholarship. WSAC and the colleges also should explore why some students who are eligible for the scholarship do not receive an award.

Recommendations

The Legislative Auditor makes two recommendations.

Recommendation #1:
The Legislature should continue the Dual Enrollment Scholarship

The scholarship has reduced financial barriers for low-income Running Start students, as the Legislature intended. Because WSAC and pilot sites have not spent all available funds, the Legislature may want to consider changes, such as expanding eligibility and adding other eligible expenses.

Legislation Required: Yes. Without legislative action, RCW 28B.76.730 will expire on June 30, 2025.

Fiscal Impact: $750,000 per year under current appropriation levels.

Implementation Date: 2025 Legislative Session.

Agency Response: WSAC concurs.

Recommendation #2:
WSAC should provide consistent and documented guidance and technical assistance to pilot sites and improve its oversight

WSAC should make rules and provide documented guidance to ensure pilot sites administer the scholarship consistently and in accordance with statutory requirements, including how to determine eligibility and allowable expenditures.

WSAC also should provide guidance to help colleges ensure that they award all scholarship funds to eligible low-income Running Start students. For example, guidance can help colleges:

- Decide how much scholarship funding to request.

- Identify eligible students.

- Distribute the funding.

- Understand allowable expenditures.

Additional technical assistance could strengthen colleges' capacity to administer the dual enrollment scholarship.

WSAC should improve its oversight of the dual enrollment scholarship program. Improvements may include:

- Improving cost controls to limit the use of funds for ineligible expenditures.

- Ensuring colleges report data needed to evaluate the program.

WSAC should coordinate with colleges to ensure administrative and reporting requirements are not overly burdensome.

Legislation Required: No

Fiscal Impact: JLARC staff assume this can be implemented within existing resources.

Implementation Date: WSAC should issue guidance by June 30, 2025, and establish rules by June 30, 2026.

Agency Response: WSAC partially concurs.

Agency and OFM responses

WSAC concurs with recommendation #1 and partially concurs with recommendation #2. See **attached letter (PDF)**.

The Office of Financial Management (OFM) was given an opportunity to comment on this report. OFM responded that it does not have any comments.

Legislative Auditor comment

WSAC partially concurs with the recommendation to provide consistent and documented guidance and technical assistance to pilot sites and improve its oversight.

Its response and JLARC's report both note that WSAC provided some documentation and assistance on a case-by-case basis.

WSAC's existing guidance documents do not explain how pilot sites should calculate GPA or determine if a student is eligible for free or reduced-priced lunch (FRPL). Our review found that pilot sites used different ways to determine student eligibility and allowable expenditures. It is not clear if these determinations are consistent with legislative intent.

The documents also contain conflicting information on allowable expenditures and apprenticeship materials. Some pilot sites were not aware of which expenditures were eligible. Others used funds for ineligible expenditures.

Improving guidance and oversight would help WSAC ensure funds are used efficiently, effectively, and in accordance with statutory requirements.

Current recommendation status

JLARC staff follow up on the status of Legislative Auditor recommendations to agencies and the Legislature for four years. The most recent responses from agencies and status of the recommendations in this report can be viewed on our **Legislative Auditor Recommendations page**.

Appendices

Appendix A: Expenditures by pilot site | Appendix B: WSAC performance measures | Appendix C: Sunset reviews | Appendix D: Applicable statutes | Appendix E: Study questions | Appendix F: Methods | Appendix G: Audit authority

Appendix A: Expenditures by pilot site

JLARC staff assessed invoices from pilot sites to determine expenditures over time.

Figure 14: Awards and expenditures by pilot site (FY 2020-24)

Pilot site	Amount available	Scholarships awarded	Unspent	Percent unspent
Bellevue College	$70,000	$69,946	$54	0%
Central Washington University	$84,680	$53,695	$30,985	37%
Clark College	$271,335	$214,764	$56,571	21%
Clover Park Technical College	$60,000	$0	$60,000	100%
Columbia Basin College	$12,500	$2,947	$9,553	76%
Community Colleges of Spokane	$134,546	$108,618	$25,928	19%
Eastern Washington University	$93,634	$93,689	-$55	0%
Edmonds College	$10,000	$9,651	$349	3%
Everett Community College	$83,641	$71,689	$11,952	14%
Grays Harbor College	$52,650	$27,544	$25,106	48%
Green River College	$411,118	$384,428	$26,690	6%
Highline College	$242,352	$184,963	$57,389	24%
Lake Washington Institute of Technology	$72,143	$10,749	$61,394	85%
Olympic College	$55,000	$55,000	$0	0%
Peninsula College	$70,000	$65,326	$4,674	7%
Renton Technical College	$52,000	$3,587	$48,413	93%
Skagit Valley College	$65,270	$28,552	$36,718	56%
Whatcom Community College	$62,000	$53,602	$8,398	14%
College in the High School pilot sites	**$1,270,973**	**$959,092**	**$311,881**	**25%**

Note: Invoice data was not available from Clover Park Technical College or Skagit Valley College as of August 15, 2024.

Source: JLARC staff analysis of pilot site invoices as of August 15, 2024.

Appendix B: WSAC performance measures

Data collected by WSAC is not sufficient to determine effect on access:

- **Aggregate level data**: Colleges collected data at the aggregate level. The data does not follow a particular scholarship recipient and whether/how the recipient has benefited from participation. Colleges confirmed that some participants might have received the scholarship in one quarter but not in the next quarter. Other recipients might have benefitted from the program during several quarters. Some colleges also have different ways of implementing the program.

- **Pilot sites were also not consistent** over the different years. Some pilot sites started during the program while others stopped participating.

- **Missing data:** WSAC has collected data for 2019-2023. Not all colleges reported data for all quarters. Only a few colleges reported baseline data for the year 2018-2019. However, for the baseline data some colleges collected data on an annual basis, while some colleges collected data on a quarterly basis. Some measures had high numbers of missing data. This is particularly true for measures related to the number of credits scholarship recipients earned towards an associate degree.

- **Duplication:** The student count in the data might be duplicative for several measures. Colleges collected data on the number of courses taken, credits attempted, and credits earned. However, it is likely that students take more than one course and earn several credits during a quarter.

The table below includes the 18 performance measures that WSAC set. The last column indicates whether the data is sufficient for analysis:

- Yes: Data can be analyzed.

- Partially: Data can be analyzed, but there are caveats. For example, the data may be duplicative, some data may be missing, or there is no baseline data.

- No: The information was not collected.

Figure 15: WSAC performance measures

Indicator	Performance measures	Data sufficient?
1	**Number of eligible students served. This data will be presented as follows:**	
1a	Total number of students served (non-duplicative count) at pilot sites for both components of the pilot program: College in the High School (CiHS) and Running Start (RS)	**Partially**
1b	Total number of eligible students (non-duplicative count) at pilot sites for both components of the pilot program (CiHS and RS)	**Partially**
2	**Number of courses completed (C or better) and college credits earned through scholarship participation for both components of the pilot program (CiHS and RS). This data will be presented as follows:**	
2a	Number of courses attempted by scholarship recipients	**Partially**
2b	Number of courses completed by scholarship recipients	**Partially**
2c	Number of courses completed for college credit by scholarship recipients	**Partially**
2d	Number of college credits earned by scholarship recipients	**Partially**

Indicator	Performance measures	Data sufficient?
3	**Number of courses completed (C or better) and college credits earned through scholarship participation for both components of the pilot program (CiHS and RS) for graduating seniors. This data will be presented as follows:**	
3a	Number of courses attempted by graduating seniors who are scholarship recipients	**No**
3b	Number of courses completed by graduating seniors who are scholarship recipients	**No**
3c	Number of courses completed for college credit by graduating seniors who are scholarship recipients	**No**
3d	Number of college credits earned by graduating seniors who are scholarship recipients	**No**
4	**Increase in program participation by scholarship eligible (free- or reduced-priced lunch eligible; 2.0 GPA) students in both components of the pilot program (CiHS and RS). This data will be presented as follows:**	
4a	Number of courses completed by scholarship recipients compared to number of scholarship eligible student course completion from 2018-2019 academic year through 2020-21 academic year	**Partially**
4b	Number of college credits earned by scholarship recipients compared to number of scholarship eligible student course completion from 2018-2019 academic year through 2020-21 academic year	**Partially**
5	**Comparison of scholarship-eligible and non-scholarship eligible student course-taking & credit-earning behavior. This data will be presented as follows:**	
5a	Number of courses completed by scholarship recipients compared to number of courses completed by non-scholarship recipients	**Partially**
5b	Number of college credits earned by scholarship recipients compared to number of college credits earned by non-scholarship recipients	**Partially**
6	**Amount of financial support provided by scholarship. This will be presented as follows:**	
6a	CiHS: Per scholarship recipient, the average dollar amount of scholarship money spent on tuition RS: Per scholarship recipient, the average dollar amount of scholarship money spent on each of the following categories:	**No longer applicable**

Indicator	Performance measures	Data sufficient?
6bi	Book vouchers	**Yes**
6bii	Additional fees (course/lab fees)	**Yes**
6biii	For year 2, professional/technical course or apprentice fees	**No**

Source: WSAC

Appendix C: Sunset reviews

A sunset review is a specific kind of JLARC study. It assesses if the state still needs a program or agency.

Sunset Act guides JLARC's review of a program or agency

A sunset review asks whether the program or agency:

- Complies with legislative intent.

- Operates efficiently and economically.

- Reaches expected performance goals and targets.

- Duplicates activities done by another entity or the private sector.

The review also examines the possible effect of ending or changing the program or agency.

The Sunset Act is a Washington Law: Chapter 43.131 RCW

The law specifies steps in the review:

1. Legislature sets a date for a program or agency to end under the Sunset Act. New programs or agencies operate for at least seven years before the end date.

2. Agency sets performance measures and collects data.

3. JLARC staff completes a sunset review one year before the end date. The Legislative Auditor must recommend legislative action.

4. The Legislature decides whether to continue, change, or end the program or agency. If the Legislature does not act, the program or agency ends.

What are the agency's responsibilities?

Under the Sunset Act, an agency must:

1. Develop performance measures and a data collection plan.

2. Send the measures and plan to JLARC staff within one year of the legislation's effective date.

3. Implement the data collection plan.

4. Submit resulting performance information to JLARC.

Appendix D: Applicable statutes

RCW 28B.76.730 | Washington dual enrollment scholarship pilot program   +

Appendix E: Study questions

This study aimed to answer the following questions, which were presented to JLARC in April 2024 (**view here**).

1. To what extent has the Dual Enrollment Scholarship pilot program complied with legislative intent to reduce barriers and increase access to postsecondary education for low-income students?
   a. Are there racial disparities in student access to the program?

2. Has WSAC administered the program in an efficient and economical manner, with adequate cost controls in place?

3. To what extent does the program duplicate the activities of other entities or the private sector?

4. To what extent is WSAC meeting its performance measures for the program?

5. What are the possible effects of terminating or changing the program? Is there any evidence these effects could have disparate impacts on students?

Appendix F: Methods

The methodology JLARC staff use when conducting analyses is tailored to the scope of each study, but generally includes the following:

- **Interviews** with stakeholders, agency representatives, and other relevant organizations or individuals.

- **Site visits** to entities that are under review.

- **Document reviews**, including applicable laws and regulations, agency policies and procedures pertaining to study objectives, and published reports, audits or studies on relevant topics.

- **Data analysis**, which may include data collected by agencies and/or data compiled by JLARC staff. Data collection sometimes involves surveys or focus groups.

- **Consultation with experts** when warranted. JLARC staff consult with technical experts when necessary to plan our work, to obtain specialized analysis from experts in the field, and to verify results.

The methods used in this study were conducted in accordance with Generally Accepted Government Auditing Standards.

More details about specific methods related to individual study objectives are described in the body of the report under the report details tab or in technical appendices.

Appendix G: Audit Authority

The Joint Legislative Audit and Review Committee (JLARC) works to make state government operations more efficient and effective. The Committee is comprised of an equal number of House members and Senators, Democrats and Republicans.

JLARC's nonpartisan staff auditors, under the direction of the Legislative Auditor, conduct performance audits, program evaluations, sunset reviews, and other analyses assigned by the Legislature and the Committee.

The statutory authority for JLARC, established in **Chapter 44.28 RCW**, requires the Legislative Auditor to ensure that JLARC studies are conducted in accordance with Generally Accepted Government Auditing Standards, as applicable to the scope of the audit. This study was conducted in accordance with those applicable standards. Those standards require auditors to plan and perform audits to obtain sufficient, appropriate evidence to provide a reasonable basis for findings and conclusions based on the audit objectives. The evidence obtained for this JLARC report provides a reasonable basis for the enclosed findings and conclusions, and any exceptions to the application of audit standards have been explicitly disclosed in the body of this report.

JLARC members on publication date

Senators	Representatives
Bob Hasegawa	Emily Alvarado
Liz Lovelett	Stephanie Barnard
Mark Mullet, Chair	April Berg
Ann Rivers	Jake Fey
Jesse Salomon	Keith Goehner
Shelly Short	Stephanie McClintock
Lynda Wilson, Secretary	Ed Orcutt, Vice Chair
Keith Wagoner	Gerry Pollet, Assistant Secretary